1 2 3 4 5	THE LAW OFFICE OF NATHAN D. BORRIS, ESQ. Nathan D. Borris, Esq. SBN 266090 1380 A Street Hayward, CA 94541 (510) 581-7113 (510) 581-7112 Fax nateborris@gmail.com
6 7 8	UNITED STATES BANKRUPTCY COURT IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION
9 10 11 12 13	) Case No.: 19-42592 RLE ) Chapter 13  In Re: ) DEBTOR'S OPPOSITION TO LAUREN J. MASSA-LOCHRIDGE, ) TRUSTEE'S MOTION TO DISMISS FOR ) FAILURE TO MAKE PLAN PAYMENTS Debtor ) AND REQUEST FOR HEARING )
15 16 17	On November 23, 2020, Martha Bronitsky, Chapter 13 Trustee, filed a motion to
18	dismiss for failure to make plan payments, alleging delinquent payments totaling \$9,940.00.  Debtor mailed a payment for \$10,000.00 on Friday, December 11, 2020 to the Trustee.
20   21   22   23   24	Overnight service was requested for the delivery through the US Postal Service, but the delivery that was originally set for Saturday, December 12, 2020 was delayed. Debtor expects that the payment will be delivered to the Trustee no later than today. This payment will bring Debtor's plan current through November 2020. Tracking information is attached.
24 25 26	Insofar as the Trustee seeks to prosecute her Motion to Dismiss filed on November 23, 2020 despite the foregoing payment information, Debtor hereby requests that a hearing be set thereon.

#### ALERT: USPS IS EXPERIENCING UNPRECEDENTED PACKAGE INCREASES AND LIMITED EMP...

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Tracking Number: EJ337555046US

**Scheduled Delivery by** 

# **SATURDAY**

12 DECEMBER 2020 (i)

by **12:00pm ①** 

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## **In-Transit**

December 12, 2020 at 12:08 pm Arrived at Post Office CHICAGO, IL 60680

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Tracking History	~
Product Information	~

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